

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. AMS is the only defendant in the listed actions. Accordingly, Plaintiffs and AMS jointly move the court to dismiss these actions with prejudice and terminate these actions from the docket of the court, parties to bear their own costs.

Respectfully:

/s/ Barbara Binis

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*Attorney for Plaintiffs on Exhibit A*

Dated: February 6, 2019

**EXHIBIT A – WAGSTAFF & CARTMELL**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:14-CV-18219	Christine Stafford v. American Medical Systems, Inc.
2:16-CV-01394	Joane Carpenter, Charles Carpenter v. American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis